# **PRIVACY POLICY**

## **KAL TIRE PRIVACY POLICY**

At Kal Tire protecting your personal information is a priority. We are committed to providing our customers with exceptional service. Providing this service includes the collection and use of some personal information about our customers.

## PERSONAL INFORMATION COLLECTED

When you visit us at one of our locations, talk to us online, call us on the phone, or visit our website, we often will collect personal information. We know your privacy is of the utmost importance and Kal Tire does not and will not disclose trade, rent, sell or otherwise transfer personal information for any purpose other than those set out herein.

We will obtain the consent of our clients and customers where required and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances. Our privacy commitment includes ensuring the accuracy, confidentiality and security of our clients' and customers' personal information and allowing our clients and customers to request access to, and correction of, their personal information. Individuals are given the opportunity to opt-out of receiving email communications from Kal Tire by using the unsubscribe mechanisms at the bottom of the emails. All email communications are reviewed regularly in order to ensure compliance with Canada's anti-spam legislation (CASL).

### **CONSENT**

We will obtain client and customer consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).

Consent can be provided orally, in writing, electronically, through an authorized representative, or it can be implied where the purpose for collecting using or disclosing the personal information would be considered obvious and the client or customer voluntarily provides personal information for that purpose.

We may collect, use or disclose personal information without the client or customer's knowledge or consent in the following limited circumstances:

- when the collection, use or disclosure of personal information is permitted or required by law;
- in an emergency that threatens an individual's life, health, or personal security;
- when the personal information is available from a public source (e.g., a telephone directory);
- when we require legal advice from a lawyer;
- for the purposes of collecting a debt;
- to protect ourselves from fraud; or
- to investigate an anticipated breach of an agreement or a contravention of law.

### AT KAL TIRE LOCATIONS

When you visit a Kal Tire location we will often ask for information such as full name, phone number, address, and vehicle information. This information allows us to accurately maintain records regarding your vehicle service, billing, and contact information.

#### KALTIRE.COM

Personal information, such as your postal code, is requested through our online web store in order to ensure that the product availability listed for you at your nearest locations is accurate.

#### THIRD PARTY PROVIDERS

Kal Tire often uses service providers to assist us with rebate and customer service functions. We only share the information necessary for these service providers to perform their role, and require they adhere to the highest possible levels of confidentiality with respect to the use of this information. Rebates sent to customers may come in many forms, including pre-paid cards, cheques, or other third party products and it may be necessary to disclose information about you to third parties in order for you to receive the rebate. You may request that we not provide information about you to third party rebate providers, but in that case the rebate will not be available to you.

Kal Tire is dedicated to ensuring we provide our customers with exceptional service. Part of this process is conducting follow-up customer service calls to our recent customers. These calls are performed by a third party research service provider.

Information given to the research service provider includes details such as customer name, phone number and transaction details (store visited, transaction date, transaction aliases, vehicle details, invoice number and amount, team member name).

This information is used primarily to contact customers to conduct the follow-up survey. The research provider does not give out personal information to any organization without your consent or request. The research service provider does not use surveys to sell anything, they are not direct marketers or telemarketers and their privacy standards meet or exceed the standards of the Market Research and Intelligence Association (MRIA). We will not use or disclose client or customer personal information for any additional purpose unless we obtain consent to do so.

## **SECURING PERSONAL INFORMATION**

We are committed to ensuring the security of client and customer personal information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks. We will use appropriate security measures when destroying personal information of clients and customers. We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

#### PROVIDING CLIENTS AND CUSTOMERS ACCESS TO PERSONAL INFORMATION

Our clients and customers have a right to access their personal information, subject to limited exceptions, such as solicitor-client privilege, for health and safety concerns, or where disclosure would reveal personal information about another individual. A request to access personal information must be made in writing and provide sufficient detail to identify the personal information being sought. We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request. A minimal fee may be charged for providing access to personal information. Where a fee may apply, we will inform the client or customer of the cost and request further direction from the client or customer on whether or not we should proceed with the request. If a request is refused in full or in part, we will notify the client or customer in writing, providing the reasons for refusal and the recourse available to the client or customer.

## **CHANGES TO THE KAL TIRE PRIVACY POLICY**

Our privacy commitment includes maintaining and updating a Privacy Policy which ensures the accuracy, confidentiality and security of our clients and customers personal information. All changes will be posted on kaltire.com

#### QUESTIONS AND COMPLAINTS: THE ROLE OF THE PRIVACY OFFICER

Our Privacy Officer is a designated individual responsible for ensuring that Kal Tire is compliant with our Privacy Policy and the *Personal Information Protection Act*. Clients and customers should direct any complaints, concerns or questions regarding Kal Tire's compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client or customer may also write to the Information and Privacy Commissioner of British Columbia.

Contact information for Kal Tire's Officer: privacy@kaltire.com